

Exhibit 32

Deposition of Dana F. White (August 9,
2017) – Vol. 2 (excerpted)

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON)	
FITCH, on behalf of)	
themselves and all others)	
similarly situated,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.
)	2:15-cv-01045-RFB-(PAL)
)	
ZUFFA, LLC, d/b/a Ultimate)	
Fighting Championship and)	
UFC,)	
)	
Defendant.)	
_____)	

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION OF DANA F. WHITE

AFTERNOON AND EVENING SESSIONS

LAS VEGAS, NEVADA

AUGUST 9, 2017

4:01 P.M.

REPORTED BY:
MICHELLE R. FERREYRA, CCR No. 876
JOB NO. 51036-B

<p style="text-align: right;">285</p> <p>1 2 I N D E X (Continued) 3 Exhibit 79 Dana White, Wanderlei Silva 358 was paid \$9.7 by the UFC, by Nate Wilcox, September 27, 2014 4 Exhibit 80 Portuguese article from Globo 360 5 Exhibit 81 Video excerpt from 361 6 September 11, 2013 from UFC 7 Tonight Interview 8 Exhibit 82 Excel spreadsheet 363 9 Exhibit 83 News article from the 394 Las Vegas Sun 10 Exhibit 84 MMA Junkie article 403 11 Exhibit 85 Two-page article dated 405 12 June 10, 2012 from Damen Martin 13 Exhibit 86 July 2, 2013 video from 406 14 UFC 162 Post-fight Scrum in Las Vegas, Nevada 15 Exhibit 87 Excerpt from April 16, 2014 408 16 Tough Nation's Finale Post-fight Media Scrum in Quebec City, Quebec, Canada 17 Exhibit 88 Video excerpt dated May 11, 2014 410 18 UFC Fight Night 40, Post-fight Scrum in Cincinnati, Ohio 19 Exhibit 89 Excerpt from February 19, 2015 412 20 from the gathering at Banff, Canada 21 Exhibit 90 Video excerpt from 413 22 February 2, 2010 from UFC 108 Post-fight Media Scrum in 23 Las Vegas 24 Exhibit 91 Video excerpt from September 21, 417 25 2011 taken from the UFC 135 Pre-fight Scrum in Denver, Colorado</p>	<p style="text-align: right;">287</p> <p>1 2 LAS VEGAS, NEVADA, WEDNESDAY, AUGUST 9, 2017; 3 4:01 P.M. 4 -000- 5 6 VIDEOGRAPHER: The time is approximately 7 4:01 p.m. Let the record reflect Michelle Ferreyra is 8 now the court reporter. We are back on the record. 9 (Exhibit 61 marked.) 10 11 EXAMINATION 12 BY MR. DELL'ANGELO: 13 Q. Mr. White, I'm going to hand you what I have 14 marked as Exhibit 61 to the deposition. Exhibit 61 is 15 from FoxSports dated December 12, 2013 by Damen Martin. 16 Before we took our break, we were talking about 17 Invicta. Do you recall that? 18 A. Yes. 19 Q. Okay. You're quoted at the bottom here 20 as -- do you see that quote, that it's in kind of a 21 larger font there -- 22 A. Yes. 23 Q. -- okay, at the bottom? And it says, "The 24 girls who go into Invicta can now look and say, Jesus, 25 we're going it fight in the UFC some day." Do you see</p>
<p style="text-align: right;">286</p> <p>1 2 I N D E X (Continued) 3 Exhibit 92 Article taken from TMZ from 421 March 6, 2017 4 Exhibit 93 Article from MMA Junkie, 423 5 6 Exhibit 94 Two-page e-mail series, 442 WME_ZUFFA_001417791 7 Exhibit 95 Video excerpt from 448 March 14, 2014 from the 8 UFC 171 Pre-fight Scrum in Dallas, Texas 9 10 Exhibit 96 Video Excerpt from 451 April 16, 2014 Tough Nation Finale Post-fight Scrum in 11 Quebec City, Canada 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">288</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL 2 that? 3 A. Yes. 4 Q. Did you say that? 5 A. I don't remember saying it, but, yeah. I'm 6 sure I did. 7 Q. Okay. Any reason to believe that that's not 8 accurate, that statement? 9 A. No. 10 Q. Okay. And what is that? What do you take 11 that to mean, that statement? 12 A. It means that I -- I was the guy that said 13 women would never fight in the UFC. And when 14 women -- you know, when I did decide to do it, it 15 be -- it was huge. It became very big. And, you know, 16 I'm sure a lot of these women that were in this 17 division thought they would never fight in the UFC. 18 Q. So it's a big deal to get -- have female 19 fighters in the UFC? 20 A. It became a big deal, yeah. 21 Q. And it's certainly a big deal for the female 22 fighters as well; right? 23 A. Absolutely. 24 Q. Okay. And -- and that became an important 25 part of your business, the UFC's business?</p>

3 (Pages 285 to 288)

<p style="text-align: right;">289</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 A. Correct.</p> <p>3 Q. It actually it lead to the rise of champions</p> <p>4 like Rhonda Rousey; right?</p> <p>5 A. Yeah.</p> <p>6 Q. And she became a big star; right?</p> <p>7 A. Huge star.</p> <p>8 Q. Okay. So would you flip to the second page</p> <p>9 of the document, please, at the top. You appear to be</p> <p>10 quoted again. Do you see that at the beginning of Bad</p> <p>11 As? Do you see that language?</p> <p>12 A. Yes.</p> <p>13 Q. But would you first read -- read that first</p> <p>14 sentence there aloud?</p> <p>15 A. Aloud?</p> <p>16 Q. Yeah.</p> <p>17 A. "As bad as people don't want to believe it,</p> <p>18 they don't want to hear it, meaning the other owners of</p> <p>19 other mixed martial arts organizations, that's why they</p> <p>20 are -- that's why they all are -- they all are the AAA</p> <p>21 to the UFC."</p> <p>22 Q. Okay. Any reason to believe that you did not</p> <p>23 say that in December of 2013?</p> <p>24 A. No.</p> <p>25 Q. Okay. And you believed that to be true at</p>	<p style="text-align: right;">291</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 litigation. I'm marking them as Exhibit 62.</p> <p>3 (Exhibit 62 marked.)</p> <p>4 BY MR. DELL'ANGELO:</p> <p>5 Q. Exhibit 62 begins with 2699687.</p> <p>6 A. I'm sorry, 62?</p> <p>7 Q. Yes.</p> <p>8 A. Oh, no. No page.</p> <p>9 Q. I'm just identifying the exhibit number --</p> <p>10 A. Okay.</p> <p>11 Q. -- for the record, Mr. White. And I -- I</p> <p>12 will tell you that it's my understanding that the</p> <p>13 compilation of text messages at Exhibit 62 were taken</p> <p>14 from your -- one of your devices, Mr. White.</p> <p>15 A. Okay.</p> <p>16 Q. So would you turn to page 78 of Exhibit 62,</p> <p>17 line 1600.</p> <p>18 A. Tell me the page again.</p> <p>19 Q. 7-8, 78.</p> <p>20 A. Okay.</p> <p>21 Q. Are you at page 78?</p> <p>22 A. Yeah.</p> <p>23 Q. Okay. And would you go to line 1600, please.</p> <p>24 A. Yes.</p>
<p style="text-align: right;">290</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 that time?</p> <p>3 A. I believe it to be true today.</p> <p>4 Q. Okay. And would that include World Series of</p> <p>5 Fighting?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And the -- the World Series of</p> <p>8 Fighting hasn't promoted any events in the</p> <p>9 United States; right?</p> <p>10 A. Yes.</p> <p>11 Q. Oh, I'm sorry.</p> <p>12 A. They're from the United States.</p> <p>13 Q. Withdraw that. I was thinking of something</p> <p>14 different. Thank you.</p> <p>15 A. They're -- they're actually from Vegas.</p> <p>16 Q. Yeah.</p> <p>17 The World Series of Fighting has released</p> <p>18 some of its fighters to the UFC; right?</p> <p>19 A. Yes. We have signed guys from their</p> <p>20 organization?</p> <p>21 Q. What about Jessica Aguilar, she was released</p> <p>22 to the UFC; right?</p> <p>23 A. I don't know.</p> <p>24 Q. Okay. Mr. White, let me hand you another</p> <p>25 compilation of text messages that were produced in this</p>	<p style="text-align: right;">292</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

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<p style="text-align: right;">293</p> <p>[REDACTED]</p> <p>11 Q. Okay. You can put that document aside.</p> <p>12 Thank you.</p> <p>13 Are you aware of a fight promotion by the</p> <p>14 name of ONE FC?</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p style="text-align: right;">295</p> <p>DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>BY MR. DELL'ANGELO:</p> <p>Q. This is taken from an August 23, 2014 UFC Fight Night 48 Post-Night Scrum in Macau, China. So if you would direct your attention to the video screen.</p> <p>MR. ISAACSON: I will object to the use of this video in questions on the basis of completeness.</p> <p>(Video clip playing.)</p> <p>REPORTER: One more thing. There's a couple of ONE FC. You got RUFF, a little tiny one, but they're doing good work. And a couple others, Kunlun and some others. A lot of times, UFC has bought out their competitors, and it really helped out and did a lot, like Strikeforce. Do you guys have plans like that? Is that how you think over there?</p> <p>MR. DANA WHITE: No. You know, to have -- to have grassroots companies like that is great for us. You have to have it. I mean, we -- we need organizations like that around for the guys to get experience, get fights under their belt, make some money, and -- and -- and start to consider making this a career. So having small organizations out there is a great thing. It's not a -- you know, I love it.</p> <p>BY MR. DELL'ANGELO:</p> <p>Q. So, Mr. White, in August --</p>
<p style="text-align: right;">294</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>14 Q. So are you familiar with a fight promotion</p> <p>15 ONE FC?</p> <p>16 A. Yes.</p> <p>17 Q. Okay.</p> <p>18 A. Very familiar.</p> <p>19 Q. Is it correct that ONE FC only promotes MMA</p> <p>20 bouts in Asia?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And when did you -- well, let's -- I'm</p> <p>23 going to play another video excerpt for you.</p> <p>24 (Exhibit 63 marked.)</p> <p>25 \\\</p>	<p style="text-align: right;">296</p> <p>DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>MR. ISAACSON: I am just going to raise an objection, that because parts of that were hard to hear I don't think the court reporter's able to create a transcript of it. So --</p> <p>BY MR. DELL'ANGELO:</p> <p>7 Q. Mr. White, in August of 2014, did you view</p> <p>8 ONE FC as a -- as a grassroots promotion?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And but you, nevertheless, thought</p> <p>11 that having a smaller promotion, like ONE FC out there</p> <p>12 at the time, was a -- was a good thing for the UFC;</p> <p>13 right?</p> <p>14 A. I will tell you what -- I will tell you what</p> <p>15 drives me crazy, what cracks me up, is we're trying to</p> <p>16 get into Asia; so we have been working on Asia for a</p> <p>17 long time. And every time I do interviews over there,</p> <p>18 they say, "Are you guys like ONE FC? Is that what you</p> <p>19 are." Yeah. Yeah. So it's owned by a billionaire.</p> <p>20 And every time I do interviews in Asia, they ask if the</p> <p>21 UFC is like ONE FC. What are you guys, like ONE FC?</p> <p>22 Yeah, no. We're like the UFC, but yeah. They're not a</p> <p>23 minor grassroots organization. They're a monster.</p> <p>24 Q. In Asia?</p> <p>25 A. Yeah.</p>

<p style="text-align: right;">297</p> <p>DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>Q. And they don't promote events in the United States; right?</p> <p>A. No. Nobody knows what the UFC is in Asia. They all know ONE FC.</p> <p>Q. What's your basis for saying that? Have you spoken to everybody in Asia?</p> <p>A. Pretty much. Everybody that you can do an interview with, yes. Everybody that you can do an inter with -- interview with that's worth doing an interview with in Asia always asks me if we're like the ONE FC.</p> <p>Q. You promote events in Asia; right?</p> <p>A. Yes.</p> <p>Q. Okay. And would you promote events in Asia if nobody knew who UFC is?</p> <p>A. Nobody does know who UFC is. I'm working on that.</p> <p>Q. Okay. But you -- so you, nevertheless, continue to promote events there; right?</p> <p>A. We do continue. Because I'm going to continue until they know what the UFC is.</p> <p>Q. All right. So Bellator is also an MMA promotion in the United States; right?</p> <p>A. Yes.</p>	<p style="text-align: right;">299</p> <p>DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>A. No.</p> <p>Q. If in 2012, the UFC -- sorry. If in 2012, Bellator would have removed matching rights provisions in its contracts, would the UFC have done the same?</p> <p>A. Probably not, no.</p> <p>Q. All right. So I'm going to play another video for you, Mr. White. This is an excerpt taken from a January 10, 2013 -- let me withdraw that. This is an excerpt taken from the January 2013 interview with MiddleEasy.com. Let me direct your attention to the video screen.</p> <p>MR. ISAACSON: I don't think you have given us a number.</p> <p>MR. DELL'ANGELO: Sorry. It's -- we will mark it as Exhibit 64.</p> <p>(Exhibit 64 marked.)</p> <p>MR. ISAACSON: All right. And because it's an excerpt, I will object to questions on this on the grounds of completeness.</p> <p>(Video clip playing.)</p> <p>MR. DANA WHITE: You see the thing, the Bellator thing, I have never said a bad word about them, ever. They're a smaller organization that's out</p>
<p style="text-align: right;">298</p> <p>DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>Q. Okay. Let me show you -- MR. DELL'ANGELO: 93, please. BY MR. DELL'ANGELO:</p> <p>Q. Do you recall a time -- well, let's just back up. There was a time when Bjorn Rebney ran Bellator; right?</p> <p>A. Bjork, yes.</p> <p>Q. Okay. Did you say Bjork?</p> <p>A. Yes.</p> <p>Q. Is that -- is that a pejorative or is that his name? Do I have it wrong?</p> <p>A. That's what I like to call him.</p> <p>Q. So just for the -- for the purposes of our testimony, I'm going to refer to him as Mr. Rebney. Okay?</p> <p>A. Okay.</p> <p>Q. Okay. You can refer to him as Bjork if you wish. I'll understand that Bjork means Mr. Rebney.</p> <p>A. Got it.</p> <p>Q. Okay. Do you recall a time when you were told that Mr. Rebney was prepared to get rid of matching rights provisions in its contracts if the UFC would do the same?</p>	<p style="text-align: right;">300</p> <p>DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>there. You know, we need smaller promotions. It's -- it's not a bad thing.</p> <p>BY MR. DELL'ANGELO:</p> <p>Q. Okay. In January of 2013, Mr. White, did you believe that Bellator was a smaller organization?</p> <p>A. Yes.</p> <p>Q. And were you able to -- to hear the audio on that video?</p> <p>A. Yes.</p> <p>Q. Okay. Do you -- did you -- is that you appearing in that video?</p> <p>A. That is me.</p> <p>Q. Okay. You -- you said that, what you heard there?</p> <p>A. Yes.</p> <p>Q. Did you have any trouble hearing it?</p> <p>A. That's me, yes.</p> <p>Q. Okay. All right. I'm going to play you another video excerpt from a February 1, 2013 UFC 156 Pre-fight Scrum in Las Vegas, Nevada, which I will mark as Exhibit 65. Mr. White, if you could direct your attention to the video screen and watch this excerpt, please.</p> <p>(Exhibit 65 marked.)</p>

6 (Pages 297 to 300)

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1 **DANA WHITE - HIGHLY CONFIDENTIAL**

2 A. Yeah.

3 Q. Okay. Is it fair to say that in February of

4 2013, you were not impressed with Bellator's

5 performance as an MMA promotion?

6 A. You can say that.

7 Q. Okay. All right. That's -- that's a yes?

8 A. Yes.

9 Q. All right. And let me play you another

10 excerpt from February 16, 2013 taken in London, England

11 at UFC FUEL TV 7 Post-fight Media Scrum.

12 A. Okay.

13 MR. ISAACSON: I will object to the use of

14 the video on the grounds -- as to questions on the

15 grounds of completeness.

16 (Exhibit 66 marked.)

17 (Video clip playing.)

18 REPORTER: Are you not worried they might be

19 able to use -- leverage all of those resources to

20 help -- you know, to rival you guys.

21 MR. DANA WHITE: They better start. They're

22 doing fucking 700,000 viewers, and the numbers are

23 dropping like fucking flies. They better start

24 leveraging something quick.

25 But they built the UFC. You know that,

<p>305</p> <p>[REDACTED]</p>	<p>307</p> <p>[REDACTED]</p> <p>20 Q. All right. And that's a -- that's -- you're</p> <p>21 saying that -- I just want to understand you. Because</p> <p>22 Mr. Coker's been in several different promotions;</p> <p>23 right?</p> <p>24 A. Right.</p> <p>25 Q. Okay.</p>
<p>306</p> <p>[REDACTED]</p>	<p>308</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 A. All failures.</p> <p>3 Q. Right. Is it your -- not withstanding the</p> <p>4 fact that the UFC got some -- I think as you testified</p> <p>5 earlier, some really great fighters from Mr. Coker's</p> <p>6 Strikeforce promotion; right?</p> <p>7 A. That we turned into stars. When you have</p> <p>8 Rhonda Rousey and you can't turn her into a star, you</p> <p>9 should probably go open a restaurant or something.</p> <p>10 Q. And so -- and so is it your testimony that at</p> <p>11 Bellator, Mr. Coker is continuing to essentially</p> <p>12 recycle has-been fighters? Is that --</p> <p>13 A. Well, no. He -- he recycles big names.</p> <p>14 Q. Right.</p> <p>15 A. That's what he does. Rampage Jackson is a</p> <p>16 huge name. Tito Ortiz is a huge name. And -- and</p> <p>17 basically, he re -- you know, takes guys with big names</p> <p>18 and puts on fights with them instead of turning guys</p> <p>19 into stars, even when he has a roster packed with</p> <p>20 stars, and one of them include Rhonda Rousey.</p> <p>21 Q. Well, Rhonda Rousey wasn't a star at the time</p> <p>22 that she was fighting under contract with Strikeforce;</p> <p>23 right?</p> <p>24 A. Till I turned her into a star.</p> <p>25 Q. Right. But the point is, she wasn't a star</p>

8 (Pages 305 to 308)

<p style="text-align: right;">309</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 at Strikeforce; correct?</p> <p>3 A. Yeah, no.</p> <p>4 Q. Okay. So -- and at this time in 2013 --</p> <p>5 A. A just for the record, I turned her into a</p> <p>6 star immediately when she got to the UFC --</p> <p>7 Q. Okay.</p> <p>8 A. -- her first fight.</p> <p>9 MR. DELL'ANGELO: Move to strike as</p> <p>10 nonresponsive.</p> <p>11 THE WITNESS: Yeah.</p> <p>12 MR. DELL'ANGELO: There's no question</p> <p>13 pending.</p> <p>14 THE WITNESS: All right.</p> <p>15 BY MR. DELL'ANGELO:</p> <p>16 Q. So in 2013 -- in mid-2013, Tito Ortiz and</p> <p>17 Rampage Jackson were effectively UFC has-beens; is that</p> <p>18 right?</p> <p>19 A. If -- if that's the way you want to look at</p> <p>20 it, yeah. They were guys -- they were guys who lost</p> <p>21 three fights in a row in the UFC.</p> <p>22 Q. Right. But they were -- they were not really</p> <p>23 UFC kind of level fighters any more; right?</p> <p>24 A. According to me, yeah. And according to Joe</p> <p>25 Silva, yes.</p>	<p style="text-align: right;">311</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 MR. ISAACSON: I will object to the use of</p> <p>3 the video in questions on the grounds of completeness.</p> <p>4 BY MR. DELL'ANGELO:</p> <p>5 Q. Were you able to see the video at Exhibit 67,</p> <p>6 Mr. White?</p> <p>7 A. Yes.</p> <p>8 Q. And were you able to hear it okay?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And did you say that, what you heard</p> <p>11 in the video?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And did they -- to whom you were</p> <p>14 referring in the video, was that Bellator?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And in the -- in your statement there,</p> <p>17 you said, "We really don't take their rejects." Did</p> <p>18 you hear that part?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. What did you mean by that?</p> <p>21 A. Well, I -- I just said it. I said, "If -- if</p> <p>22 somebody loses, we're not going to bring them to the</p> <p>23 UFC." But Eddie Alvarez wasn't undefeated either.</p> <p>24 Q. But -- but the -- the larger point is that if</p> <p>25 somebody loses in Bellator, it's not someone -- that's</p>
<p style="text-align: right;">310</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 Q. Okay. In fact, if you -- and likewise, UFC</p> <p>3 doesn't take rejects from Bellator; right?</p> <p>4 A. We have taken guys from Bellator.</p> <p>5 Q. I'm asking if you have taken rejects from</p> <p>6 Bellator?</p> <p>7 A. Define reject.</p> <p>8 Q. So let's -- let me play a video clip for you</p> <p>9 from August 22, 2013 from the UFC Fight Night 27</p> <p>10 Post-fight Scrum in Indianapolis, Indiana. This would</p> <p>11 be Exhibit 67.</p> <p>12 (Exhibit 67 marked.)</p> <p>13 (Video clip playing.)</p> <p>14 MR. DANA WHITE: You want to go, go. If you</p> <p>15 don't want to be here, why would we want you here. And</p> <p>16 then what are they doing if Eddie Alvarez loses, what</p> <p>17 do they think? He's going to come and sign a deal with</p> <p>18 the UFC? No. We actually -- we really don't take</p> <p>19 their rejects. We really don't.</p> <p>20 REPORTER: You wouldn't take him?</p> <p>21 MR. DANA WHITE: No. If Eddie loses -- if</p> <p>22 Eddie loses, why would we bring him to the UFC?</p> <p>23 BY MR. DELL'ANGELO:</p> <p>24 Q. Okay. Were you able to see the video at</p> <p>25 Exhibit 67, Mr. White?</p>	<p style="text-align: right;">312</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 not -- that's a fighter that UFC is not interested in</p> <p>3 signing; right?</p> <p>4 A. Right. So if he had lost the fight, we're</p> <p>5 not signing somebody straight off a loss. Yes.</p> <p>6 Q. In fact, he would have to win a number of</p> <p>7 fights, or she as the case may be, in another promotion</p> <p>8 before UFC would be willing to --</p> <p>9 A. Exactly.</p> <p>10 Q. -- sign them; correct?</p> <p>11 A. That -- yeah. That is the standard that we</p> <p>12 have set for our organization.</p> <p>13 Q. Okay. Let's look at -- I'm going to mark</p> <p>14 another video for you. It's taken from -- it's an</p> <p>15 excerpt taken from a September 29, 2013 UFC 168 Media</p> <p>16 Scrum in Rio de Janeiro, Brazil, which we will mark as</p> <p>17 Exhibit 68.</p> <p>18 (Exhibit 68 marked.)</p> <p>19 MR. ISAACSON: This is September 29th what</p> <p>20 year?</p> <p>21 MR. DELL'ANGELO: 2013.</p> <p>22 (Video clip playing.)</p> <p>23 REPORTER: Is there any chance like the UFC</p> <p>24 ends up buying Bellator in a couple of years?</p> <p>25 MR. DANA WHITE: There's nothing there.</p>

<p style="text-align: right;">313</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 There's nothing there that -- if you look at any of the</p> <p>3 companies that we ended up buying in the past, there</p> <p>4 was value. There's no value to that company</p> <p>5 whatsoever.</p> <p>6 If you look at Pride, look at all the</p> <p>7 contracts we got from Pride and all the guys that came</p> <p>8 over and the big fights we made. Look at the Pride</p> <p>9 library. Amazing library with some of the most</p> <p>10 talented fighters of all times.</p> <p>11 When we bought the WFA, we bought them</p> <p>12 because Rampage had a contract with them; so we bought</p> <p>13 his contract. When we bought Strikeforce, we bought</p> <p>14 their library, and we ended up getting -- I mean, just</p> <p>15 the fights we had with Nick Diaz alone was worth buying</p> <p>16 that company. Do you know what I mean?</p> <p>17 There's -- there was no value with that other -- with</p> <p>18 the other company.</p> <p>19 MR. ISAACSON: So I will object to the use of</p> <p>20 the video in questions on grounds of completeness, and</p> <p>21 because the question in the video was not intelligible.</p> <p>22 BY MR. DELL'ANGELO:</p> <p>23 Q. Mr. White, were you able to see the video</p> <p>24 that we played as Exhibit 68?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">315</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 MR. KOFFMAN: Do you want me to turn up the</p> <p>3 volume?</p> <p>4 MR. DELL'ANGELO: Yeah. Let's do that.</p> <p>5 (Video clip playing.)</p> <p>6 REPORTER: Is there any chance like the UFC</p> <p>7 ends up buying Bellator?</p> <p>8 MR. DANA WHITE: There's nothing there.</p> <p>9 There's nothing there that -- if you look at any of the</p> <p>10 companies that we ended up buying in the past, there</p> <p>11 was value. There's no value --</p> <p>12 BY MR. DELL'ANGELO:</p> <p>13 Q. Okay. Were -- were you able to hear that</p> <p>14 clear?</p> <p>15 A. Yes.</p> <p>16 Q. All right.</p> <p>17 A. Yes.</p> <p>18 Q. All right.</p> <p>19 A. What year was that?</p> <p>20 Q. That was in September of 2013. It was at the</p> <p>21 Media Scrum in connection with the UFC 168 in Rio de</p> <p>22 Janeiro.</p> <p>23 A. Got it.</p> <p>24 Q. So in -- in September of 2013, was it your</p> <p>25 view that there was nothing of value to acquire of</p>
<p style="text-align: right;">314</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 Q. Okay. Were you able to hear it okay?</p> <p>3 A. Yes.</p> <p>4 Q. Okay.</p> <p>5 A. I couldn't understand what the interviewer</p> <p>6 was saying, like if it --</p> <p>7 Q. Did -- did you understand your statement?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And you were able to hear it okay?</p> <p>10 A. Yes.</p> <p>11 Q. All right. And did you say what it is that</p> <p>12 you heard and that you were saying -- depicted as</p> <p>13 saying in that video?</p> <p>14 A. Yes.</p> <p>15 Q. Okay.</p> <p>16 A. I also didn't know what company they were</p> <p>17 talking about where there was no value.</p> <p>18 Q. Okay. All right. Why don't -- why don't we</p> <p>19 play it again and see if you can hear it better. I</p> <p>20 will represent to you that the text of the question is:</p> <p>21 Is there any chance that the UFC ends up trying to buy</p> <p>22 Bellator in a couple of years?</p> <p>23 A. Okay. I'm good with that.</p> <p>24 Q. Well, we will -- we will play it again and</p> <p>25 see if you can -- see if you can hear it.</p>	<p style="text-align: right;">316</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 Bellator?</p> <p>3 A. Yeah. Yeah. Bellator felt the same way</p> <p>4 about the UFC. That's -- that's how you talk 'em,</p> <p>5 about the competition.</p> <p>6 Q. All right. So let me show you another</p> <p>7 document. And in late 2013, did you believe -- well,</p> <p>8 were you aware that Ben Askren was an MMA fighter?</p> <p>9 A. Yes.</p> <p>10 Q. And who is Ben Askren fighting for at the</p> <p>11 time?</p> <p>12 A. Bellator. No, no, no. ONE FC. ONE FC.</p> <p>13 Oh, no. He fought for Bellator too. I don't know.</p> <p>14 What year?</p> <p>15 Q. 2013.</p> <p>16 A. I don't know.</p> <p>17 Q. Okay.</p> <p>18 A. So he was either with Bellator or ONE FC.</p> <p>19 Q. Okay. So why don't we play -- why don't we</p> <p>20 play an excerpt of a November 30, 2013 video taken from</p> <p>21 the Tough 18 Finale Prefight Interview with MMA Junkie</p> <p>22 in Las Vegas. And --</p> <p>23 (Exhibit 69 marked.)</p> <p>24 (Video clip playing.)</p> <p>25 MR. DANA WHITE: You know, I -- I wasn't even</p>

<p style="text-align: right;">317</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 going to say this because it just sounds like I'm</p> <p>3 always just (beeping) on, you know, those guys. But</p> <p>4 it's -- it's not true. There's no competition for him</p> <p>5 over at -- at Bellator. There's competition for him at</p> <p>6 World Series of Fighting. You know, this kid</p> <p>7 will -- will probably sign with them. I don't know. I</p> <p>8 mean, they've got to come to an agreement and deal.</p> <p>9 But if he does, there's -- there's actual competition</p> <p>10 for him there.</p> <p>11 MR. ISAACSON: So I will object to the use of</p> <p>12 the video in questions on the grounds of completeness,</p> <p>13 including that whoever he's talking to or whatever he's</p> <p>14 responding to is not part of the video.</p> <p>15 BY MR. DELL'ANGELO:</p> <p>16 Q. Okay. Do -- do you remember talking about</p> <p>17 Ben Askren as a -- not having competition at Bellator?</p> <p>18 A. I don't remember it, but --</p> <p>19 Q. Okay.</p> <p>20 A. Yeah.</p> <p>21 Q. And you thought Ben Askren was a -- is it</p> <p>22 correct that you didn't believe -- or sorry.</p> <p>23 Is it correct that you believe that there</p> <p>24 wasn't competition for Ben Askren at World Series of</p> <p>25 Fighting?</p>	<p style="text-align: right;">319</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 and paid him more money.</p> <p>3 MR. DELL'ANGELO: Okay. Move to strike</p> <p>4 everything after yes as nonresponsive.</p> <p>5 THE WITNESS: He doesn't want to hear the</p> <p>6 good stuff.</p> <p>7 BY MR. DELL'ANGELO:</p> <p>8 Q. Do you recall Tweeting about Ben Askren?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And do you recall Tweeting that Ben</p> <p>11 Askren makes Fitch look like Wanderlei Silva?</p> <p>12 A. Yeah.</p> <p>13 Q. Do you recall Tweeting that, "When Ben</p> <p>14 As -- when Ambien can't sleep, it takes Ben Askren, the</p> <p>15 most boring fighter in MMA history, I would rather</p> <p>16 watch flies fuck"?</p> <p>17 A. Yeah.</p> <p>18 Q. Okay.</p> <p>19 A. Ben Askren is a genius. Ben Askren started</p> <p>20 a -- a public beef with me that -- that I jumped right</p> <p>21 into, and, you know, he became pretty popular over here</p> <p>22 in the United States. He's a smart kid.</p> <p>23 MR. DELL'ANGELO: Okay. Move to strike</p> <p>24 everything after yes as nonresponsive.</p> <p>25 \\\</p>
<p style="text-align: right;">318</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 A. There was?</p> <p>3 Q. That there -- that there -- that -- is it</p> <p>4 correct that you believed that Ben Askren -- that there</p> <p>5 wasn't competition at World Series of Fighting?</p> <p>6 A. No. I said there was competition.</p> <p>7 Q. Okay.</p> <p>8 A. I said there wasn't at Bellator.</p> <p>9 Q. Okay.</p> <p>10 A. I said there was competition at -- at --</p> <p>11 Q. So you believe that there may have been</p> <p>12 competition for Ben Askren at World Series of Fighting,</p> <p>13 but not at Bellator in late 2013; is that correct?</p> <p>14 A. Yeah. Apparently, yes.</p> <p>15 Q. Okay. And then -- but you, nevertheless,</p> <p>16 thought that Ben Askren was a boring fighter; right?</p> <p>17 A. Yeah.</p> <p>18 Well, just for the record, just so you know,</p> <p>19 did you know that I tried to sign Ben Askren?</p> <p>20 Q. My question to you was whether or not you</p> <p>21 thought Ben Askren was a boring fighter?</p> <p>22 A. And the answer's yes. And I said to you, do</p> <p>23 you know that I tried to sign him?</p> <p>24 MR. DELL'ANGELO: Can I have Tab 179, please.</p> <p>25 THE WITNESS: Is that a no? ONE FC outbid me</p>	<p style="text-align: right;">320</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 BY MR. DELL'ANGELO:</p> <p>3 Q. We're going to play another video for you,</p> <p>4 Mr. White. It's an excerpt taken from an April 23,</p> <p>5 2014 interview on ESPN First Take. We will mark that</p> <p>6 as Exhibit 70 to the deposition.</p> <p>7 MR. HUNTER CAMPBELL: We're on 69?</p> <p>8 MR. DELL'ANGELO: I think 69 was the Tough 18</p> <p>9 Finale video from 11/13, wasn't it?</p> <p>10 MR. HUNTER CAMPBELL: We're on 69.</p> <p>11 MR. KOFFMAN: 69 should have been the Tough</p> <p>12 Finale.</p> <p>13 MR. DELL'ANGELO: Yeah.</p> <p>14 BY MR. DELL'ANGELO:</p> <p>15 Q. So we're going to mark as -- regardless,</p> <p>16 we're going to as Exhibit 70 an excerpt from an</p> <p>17 April 23, 2014 interview that you did on ESPN First</p> <p>18 Take. Would you take a look at the monitor, please.</p> <p>19 A. Yes.</p> <p>20 (Exhibit 70 marked.)</p> <p>21 (Video clip playing.)</p> <p>22 STEPHEN A. SMITH: But I guess what I'm</p> <p>23 asking is: How is it that you're able to give people</p> <p>24 the fights that they want to see, but in another</p> <p>25 pugilistic sport, we have to -- the promoters are</p>

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2 was available to everybody.

3 **Q. Are -- are you not understanding the**

4 **question? Because the question is: Is it possible to**

5 **stack a card by acquiring fighters rather than building**

6 **them?**

7 A. I answered the question.

8 **Q. I don't think you did.**

9 A. I answered the question.

10 MR. ISAACSON: That wasn't your last

11 question, and his answer was to your last question.

12 BY MR. DELL'ANGELO:

13 **Q. So then -- then let's -- let's see if we get**

14 **this clear. Is it possible for an MMA promotor to**

15 **stack a card without building -- without that MMA**

16 **promotor building the talent themself?**

17 A. I don't understand the question.

18 Do you want to know what's even crazier?

19 Four years ago, Strikeforce had Rhonda Rousey.

20 MR. ISAACSON: I'm going to -- I'm going to

21 strike your answer. Let him --

22 THE WITNESS: All right. I will stop. I'm

23 getting crazy over here. I drank an energy drink.

24 BY MR. DELL'ANGELO:

25 **Q. So it was your view in December of 2014 that**

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1 **DANA WHITE - HIGHLY CONFIDENTIAL**

2 **Bellator didn't have fighters to stack a card with?**

3 A. They did. Absolutely did.

4 **Q. So take a look at Exhibit 11, please. Would**

5 **you take a look at Exhibit 11, please?**

6 A. Oh, okay. Okay.

7 **Q. Would you go to page 155.**

8 A. Yeah.

9 **Q. Okay. Would you take a look at row 3446,**

10 **please.**

11 A. Yeah.

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6 **Q. Right. And so let's take a look -- well, are**
7 **you familiar with the term "legend fights" in MMA?**
8 A. Legend fights?
9 **Q. Yeah.**
10 A. Okay.
11 **Q. No. I'm asking if you are familiar with the**
12 **term?**
13 A. I'm not familiar.
14 **Q. Okay. Are you family with the term "a freak**
15 **show fight"?**
16 A. Eh, I mean, freak show, that -- that's what I
17 call some of the fights.
18 **Q. Okay. What's a freak show fight?**
19 A. So when I built this business, right,
20 I -- I -- I set standards. So I was a huge boxing fan
21 growing up. Okay? And I hated everything that boxing
22 did. Loved the sport, but hated everything they did.
23 So I had a vision in my mind of how I would do it and
24 how I would change everything from the live event to
25 the fights to how it's produced on television,

<p style="text-align: right;">337</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 everything. That's my opinion. Okay?</p> <p>3 So I went out -- with my opinion, I went out</p> <p>4 and looked at people that I thought were talented and</p> <p>5 built talent and did all this stuff, and that's my</p> <p>6 opinion.</p> <p>7 Now, if I look at some of these fights that</p> <p>8 other people do, you know, when -- when I see a fight</p> <p>9 that I don't like and I wouldn't do it my -- that's not</p> <p>10 what I would do, I call it a freak show.</p> <p>11 Q. Okay. And it was your -- was it your view</p> <p>12 that Bellator couldn't generate strong ratings unless</p> <p>13 it was putting on freak shows?</p> <p>14 A. Yes. In what I would determine to be a freak</p> <p>15 show, yes.</p> <p>16 Q. All right. So we talked a little bit</p> <p>17 earlier, do you recall, about the number of fighters</p> <p>18 that UFC had under contract and whether or not at</p> <p>19 various times there may have been too many fighters</p> <p>20 under contract. Do you recall that?</p> <p>21 A. No. That's a Joe Silva thing. There's too</p> <p>22 many fighters under contract is a Joe Silva thing.</p> <p>23 Q. Let's take a look --</p> <p>24 A. The matchmaking is a number games for those</p> <p>25 guys. If we can't get somebody at a certain amount of</p>	<p style="text-align: right;">339</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 conveying in the video is not your belief, but your</p> <p>3 testimony now is that that's Mr. Silva's belief?</p> <p>4 A. Correct.</p> <p>5 Q. Okay.</p> <p>6 MR. ISAACSON: Whoa, whoa. I will -- I</p> <p>7 neglected my objection, which I believe it was a</p> <p>8 continuing one, but the -- I object to questions based</p> <p>9 on the video on the grounds of completeness.</p> <p>10 BY MR. DELL'ANGELO:</p> <p>11 Q. Okay. Let's play -- I'm going to mark</p> <p>12 another video as Exhibit 73. Exhibit 73 is an excerpt</p> <p>13 from the same February 22, 2013 UFC 157 Pre-fight Media</p> <p>14 Scrum in Anaheim, California.</p> <p>15 MR. ISAACSON: I repeat my objection to the</p> <p>16 excerpts.</p> <p>17 MR. DELL'ANGELO: Yep.</p> <p>18 (Exhibit 73 marked.)</p> <p>19 (Video clip playing.)</p> <p>20 REPORTER: I think what some people have a</p> <p>21 problem with is just the fact that, you know, like</p> <p>22 Leonard Garcia and Dan Hardy were defending themselves</p> <p>23 on Twitter yesterday cause fans were saying, you know,</p> <p>24 "Oh, you guys still have a job. You guys keep losing."</p> <p>25 Can you just -- I think that all of us -- and you talk</p>
<p style="text-align: right;">338</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 fights, they have to be paid for not fighting.</p> <p>3 Q. Okay. I'm going to mark as Exhibit 72 an</p> <p>4 excerpt of a video from February 22, 2013 from the UFC</p> <p>5 157 Pre-fight Media Scrum in Anaheim, California.</p> <p>6 Mr. White, would direct your attention to the monitor.</p> <p>7 (Exhibit 72 marked.)</p> <p>8 (Video clip playing.)</p> <p>9 REPORTER: So how long is the rope, then, for</p> <p>10 a guy like Urijah Faber?</p> <p>11 MR. DANA WHITE: Yeah. Could be Saturday.</p> <p>12 You never know. There's over 100 guys. We're heavy.</p> <p>13 BY MR. DELL'ANGELO:</p> <p>14 Q. Is that you in the video, Mr. White?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And were you able to hear it okay?</p> <p>17 A. Yes.</p> <p>18 Q. And did you -- did you say that?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And so in February of 2013, you said</p> <p>21 that the -- you were 100 guys heavy. Did that mean you</p> <p>22 had too many -- 100 guys too many on the roster at that</p> <p>23 time?</p> <p>24 A. According to Joe Silva, yes.</p> <p>25 Q. Okay. So your -- the information that you're</p>	<p style="text-align: right;">340</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 about the bubble. We can say, Well, there are some</p> <p>3 fighters who are in the UFC primarily, and they're</p> <p>4 great fighters, but for entertainment value.</p> <p>5 MR. DANA WHITE: That's not true. So the</p> <p>6 question -- here's the question. Any fucking -- look</p> <p>7 at any sport, anybody who owns a team or a league or</p> <p>8 anything like that, when you look at Urijah -- I</p> <p>9 have -- here -- here's another fact. We have</p> <p>10 470-something guys under contract. Okay? We have over</p> <p>11 100 guys too many. We have over 100 guys too many on</p> <p>12 the roster right now.</p> <p>13 BY MR. DELL'ANGELO:</p> <p>14 Q. Okay. So, Mr. White, was that you depicted</p> <p>15 on the video?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And were you able to hear it okay?</p> <p>18 A. Yes.</p> <p>19 Q. And you said that UFC has 470-something guys</p> <p>20 under contract; correct?</p> <p>21 A. Correct.</p> <p>22 Q. Okay. And you also said that there were 100</p> <p>23 guys too many on the roster at that time?</p> <p>24 A. Yes.</p> <p>25 MR. DELL'ANGELO: Okay. I'm going to mark</p>

16 (Pages 337 to 340)

<p style="text-align: right;">341</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 another video as Exhibit 74. It's taken -- it's an</p> <p>3 excerpt from an October 19, 2013 UFC 166 Post-fight</p> <p>4 Media Scrum in Houston, Texas.</p> <p>5 (Exhibit 74 marked.)</p> <p>6 (Video clip playing.)</p> <p>7 MR. DANA WHITE: I kept telling you guys our</p> <p>8 roster is too full. Guys have to get fights. And it's</p> <p>9 like every time after a show and we cut a guy, they're</p> <p>10 like, Fuck you, Dana White. You're an idiot. This</p> <p>11 guy -- da, da, da. Shut the fuck up. Let us run our</p> <p>12 business. Look. The roster's too full.</p> <p>13 BY MR. DELL'ANGELO:</p> <p>14 Q. Mr. White, is that you depicted in the video?</p> <p>15 MR. ISAACSON: I'm objecting on the grounds</p> <p>16 of completeness.</p> <p>17 MR. DELL'ANGELO: Okay.</p> <p>18 MR. ISAACSON: In addition, that seems to be</p> <p>19 cut off at the beginning and the end.</p> <p>20 BY MR. DELL'ANGELO:</p> <p>21 Q. Okay. Mr. White, was that you depicted in</p> <p>22 the video?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And were you able to hear it okay?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">343</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 BY MR. DELL'ANGELO:</p> <p>3 Q. Mr. White, were -- was that you depicted in</p> <p>4 the video?</p> <p>5 A. Yes.</p> <p>6 Q. And were you able to see it okay?</p> <p>7 A. Yes.</p> <p>8 Q. And you heard it okay?</p> <p>9 A. Yes.</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 Q. All right. Fighter purses are -- in MMA are</p>
<p style="text-align: right;">342</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 Q. Okay. And did you again say in October of</p> <p>3 2013 that the roster was too full at the UFC?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. All right.</p> <p>6 A. So to expand on that -- Joe Silva was --</p> <p>7 Q. There's not a question pending.</p> <p>8 A. No, you don't want to hear this one?</p> <p>9 Q. No. There's just not a pending question.</p> <p>10 A. Got it.</p> <p>11 Q. So I'm going to mark as Exhibit 75 a video</p> <p>12 from September 2013 from the UFC Tonight interview.</p> <p>13 (Exhibit 75 marked.)</p> <p>14 (Video clip playing.)</p> <p>15 MR. DANA WHITE: Those guys signed him, and</p> <p>16 now they won't give him a fight until January? If you</p> <p>17 sign a -- if you sign a contract with the UFC, I owe</p> <p>18 you three fights in a year. If you don't fight those</p> <p>19 three fights in a year because of me, I still have to</p> <p>20 pay you your money.</p> <p>21 BY MR. DELL'ANGELO:</p> <p>22 Q. Mr. White --</p> <p>23 MR. ISAACSON: I will repeat my objection.</p> <p>24 MR. DELL'ANGELO: Yeah.</p> <p>25 \\\</p>	<p style="text-align: right;">344</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 reported publicly; right?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. But the fighter purse doesn't reflect</p> <p>5 necessarily the full amount that a fighter's paid; is</p> <p>6 that correct?</p> <p>7 A. Correct.</p> <p>8 Q. And that's because, at least at the UFC,</p> <p>9 fighters are sometimes compensated with bonuses or</p> <p>10 other forms of payment that are not part of their fight</p> <p>11 purse; correct?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. And you're familiar with boxing;</p> <p>14 correct?</p> <p>15 A. Yes.</p> <p>16 Q. And you've promoted boxing matches in the</p> <p>17 past; right?</p> <p>18 A. No.</p> <p>19 Q. Or you're -- you're promoting one now; right?</p> <p>20 A. Yes.</p> <p>21 Q. And you have represented boxers in the past;</p> <p>22 right?</p> <p>23 A. Yes.</p> <p>24 Q. You represented Tito Ortiz when he was a</p> <p>25 boxer; right?</p>

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1 **DANA WHITE - HIGHLY CONFIDENTIAL**

2 A. No. Tito didn't box.

3 **Q. Okay.**

4 A. He was -- there was -- there was a kid named

5 Derek Harmon who fought Roy Jones, Jr.

6 **Q. And you represented him?**

7 A. Yes.

8 **Q. Okay. You are promoting a fairly notable**

9 **boxing match right now; right?**

10 A. Yes.

11 **Q. Okay. Upcoming?**

12 A. The biggest ever in combat sports history.

13 **Q. According to the t-shirts you had printed up?**

14 A. That's right. That's right.

15 **Q. So is it correct that in boxing, the types of**

16 **bonuses that the UFC pays the conformed part of a**

17 **fighter's compensation would also have to be disclosed**

18 **publicly?**

19 A. Ask me that question again.

20 **Q. Sure. Is it correct that in boxing, a**

21 **fighter's total compensation has to be disclosed**

22 **publicly?**

23 A. I don't know. I don't know the answer to

24 that.

25 **Q. Are you familiar with something called the**

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1 **DANA WHITE - HIGHLY CONFIDENTIAL**

2 **Ali Act?**

3 A. I -- I know it, but I don't know it.

4 **Q. Oh, you don't -- you are aware of it, is that**

5 **what you're saying?**

6 A. I'm aware of it, but I don't know it.

7 **Q. Okay.**

8 A. If you asked me to break it down for you, I

9 couldn't.

10 **Q. Okay. That's fair.**

11 **And renegotiation is a regular part of your**

12 **business at UFC; right, renegotiating fighter**

13 **contracts?**

14 A. Yes. Yes.

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

347

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 **Q. So I'm going to mark as Exhibit 76 an excerpt**

6 **of a video taken on December 29, 2016 from a UFC 207**

7 **Pre-fight Scrum in Las Vegas, Nevada.**

8 **(Exhibit 76 marked.)**

9 **(Video clip playing.)**

10 MR. DANA WHITE: You honor your deal, you

11 know, or you at least get to a point, you know, because

12 **most guys never make it to the end of a UFC contract.**

13 **They will get within three fights, and then we want to**

14 **sit back down and start talking, right, to keep them.**

15 **BY MR. DELL'ANGELO:**

16 **Q. Mr. White --**

17 MR. ISAACSON: I will object on the grounds

18 of completeness --

19 **BY MR. DELL'ANGELO:**

20 **Q. Mr. White --**

21 MR. ISAACSON: -- especially that the

22 question and the answer are not present.

23 **BY MR. DELL'ANGELO:**

24 **Q. Okay. Mr. White, were you able to see the**

25 **video at Exhibit 76?**

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1 **DANA WHITE - HIGHLY CONFIDENTIAL**

2 A. Yes.

3 **Q. Okay. And were you able to hear it okay?**

4 A. Yes.

5 **Q. Okay. And you indicated that a -- a fighter**

6 **will get within three fights, and then "we will to sit**

7 **back down with them and start talking, right, to keep**

8 **them." Did you hear that part?**

9 A. Yes.

10 **Q. Okay. And were you referring to**

11 **renegotiating the fighter's contract when they got**

12 **close to the end of the contract?**

13 A. Yes.

14 **Q. Okay. You also believe the fighter pay**

15 **should not be public; right?**

16 A. It's up to the fighter.

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

<p style="text-align: right;">349</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p>	<p style="text-align: right;">351</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p>
<p style="text-align: right;">350</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 MR. DELL'ANGELO: Okay. 113, please.</p> <p>19 (Exhibit 77 marked.)</p> <p>20 BY MR. DELL'ANGELO:</p> <p>21 Q. Mr. White, I am handing you what I have</p> <p>22 marked as Exhibit 77 to the deposition. Exhibit 77 is</p> <p>23 a one-page e-mail at ZFL-1421551. Do you have that</p> <p>24 Exhibit 77, Mr. White?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">352</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

<p style="text-align: right;">357</p> <p>[REDACTED]</p> <p>18 Q. Okay. And so it has -- it has been a concern</p> <p>19 from time to time with the UFC, such that the UFC</p> <p>20 doesn't want fighters to know what other fighters are</p> <p>21 making; right?</p> <p>22 A. All the -- all the fighters know what other</p> <p>23 fighters are making. They all talk. They all talk.</p> <p>24 They all know. Even guys who say they don't want their</p> <p>25 number out there, they tell. They tell the other</p>	<p style="text-align: right;">359</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 you're getting it right? That is, the numbers that</p> <p>3 you're disclosing, do you make an effort to make sure</p> <p>4 that you're --</p> <p>5 A. Yeah. Well, I read the number somewhere. I</p> <p>6 got it -- I got it from accounting. And understand,</p> <p>7 when I -- when I put a number out, it's a total of</p> <p>8 everything. Bonuses, you know, to date what he's been</p> <p>9 paid in the UFC.</p> <p>10 Q. Sure. So --</p> <p>11 (Exhibit 79 marked.)</p> <p>12 BY MR. DELL'ANGELO:</p> <p>13 Q. Here's what we have marked as Exhibit 79.</p> <p>14 Exhibit 79 is a document entitled Dana White, Wanderlei</p> <p>15 Silva was paid \$9.7 by the UFC by Nate Wilcox,</p> <p>16 September 27, 2014. Do you recall saying publicly that</p> <p>17 Wanderlei Silva was paid 9.7 million by the UFC?</p> <p>18 A. No. I don't remember the -- the number or</p> <p>19 whatever.</p> <p>20 MR. ISAACSON: I will object to the document</p> <p>21 on the grounds of completeness --</p> <p>22 BY MR. DELL'ANGELO:</p> <p>23 Q. Yeah. The question is whether or not --</p> <p>24 MR. ISAACSON: Let me finish my objection,</p> <p>25 whether it be a excerpt from some other publication.</p>
<p style="text-align: right;">358</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 fighters.</p> <p>3 Q. You sometimes put their numbers out there;</p> <p>4 right?</p> <p>5 A. Me?</p> <p>6 Q. Yeah.</p> <p>7 A. Well, I -- the only way that I would ever</p> <p>8 another fighter -- a fighter's number out there that</p> <p>9 didn't want it out there is if he lied about what he</p> <p>10 was being paid.</p> <p>11 Q. And --</p> <p>12 A. If he lied about what he was being</p> <p>13 paid -- for example, Randy Couture. Randy Couture went</p> <p>14 out there and completely lied about what he made. And</p> <p>15 I said what he said isn't true. He made "X."</p> <p>16 Q. What about Wanderlei Silva?</p> <p>17 A. He must have lied too if I put it out there.</p> <p>18 Q. Okay. And do you know if -- if you put it</p> <p>19 out there, that is what Wanderlei Silva was paid?</p> <p>20 A. No. I don't even know what Wanderlei Silva</p> <p>21 was paid.</p> <p>22 MR. DELL'ANGELO: May I have 144, please?</p> <p>23 BY MR. DELL'ANGELO:</p> <p>24 Q. So when you -- when you do disclose fighter</p> <p>25 pay publicly, do you make an effort to make sure that</p>	<p style="text-align: right;">360</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 THE WITNESS: That's right. This is Bloody</p> <p>3 Elbow again. It's not an actual interview with me.</p> <p>4 BY MR. DELL'ANGELO:</p> <p>5 Q. So just so we're clear, you don't recall, as</p> <p>6 you sit here today, saying that Wanderlei Silva made</p> <p>7 \$9.7 million; is that --</p> <p>8 A. Correct.</p> <p>9 Q. Okay.</p> <p>10 A. And the source is Bloody Elbow.</p> <p>11 That's -- who doesn't even do interviews. They</p> <p>12 actually take stuff from other people. You guys have</p> <p>13 got to stop reading this website.</p> <p>14 Q. So you -- your view is that the quote of you</p> <p>15 may be unreliable; is that correct?</p> <p>16 A. Bloody Elbow?</p> <p>17 Q. Yeah.</p> <p>18 A. I think it speaks for itself.</p> <p>19 Q. Okay. How about Matt Riddle, do you recall</p> <p>20 disclosing his pay publicly?</p> <p>21 A. Oh, and they're saying it's from Brazil.</p> <p>22 This story was from Brazil, which was in Portuguese.</p> <p>23 And a sophisticated website like Bloody Elbow is giving</p> <p>24 the accurate --</p> <p>25 Q. I take it you don't read Portuguese; right?</p>

21 (Pages 357 to 360)

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DANA WHITE - HIGHLY CONFIDENTIAL

A. Okay. Which number?

Q. Page 41.

A. Okay.

Q. Okay. And let's go down -- I want you to

look at row 1054.

A. Okay.

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388

25

Q. Right. You can set that aside.

[illegible]

<p>397</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 Q. Right. Is that what you saw as the sort of</p> <p>3 best alternative for Mr. Kennedy at that time?</p> <p>4 MR. ISAACSON: Objection. Argumentative.</p> <p>5 THE WITNESS: If -- if that's what you're</p> <p>6 claiming, that garbagemen make more than UFC fighters</p> <p>7 do, then -- who -- who's making you fight? Nobody's</p> <p>8 making you fight.</p> <p>9 And the other thing is nobody made you sign a</p> <p>10 UFC contract. You sat down, you had a lawyer, you had</p> <p>11 representation, and when you signed the -- the</p> <p>12 contract, you were thrilled.</p> <p>13 MR. DELL'ANGELO: Move to strike as</p> <p>14 nonresponsive.</p> <p>15 BY MR. DELL'ANGELO:</p> <p>[REDACTED]</p>	<p>399</p> <p>[REDACTED]</p>
<p>398</p> <p>[REDACTED]</p>	<p>400</p> <p>[REDACTED]</p>

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DANA WHITE - HIGHLY CONFIDENTIAL

But I will tell you a story. So we were supposed to do it --

Q. Just so you know --

A. Well, no. You asked me whether we compete or not.

[illegible]

Category	Value (approximate percentage)
1	10
2	95
3	90
4	85
5	92
6	88
7	98
8	95
9	92
10	98
11	88
12	85
13	35
14	60
15	95
16	85
17	10
18	88
19	98
20	15

446

448

[REDACTED]

Q. Right. Does the UFC compete with -- well, let me withdraw that.

Do you know what the WWE is?

A. Yes.

Q. That's the World -- World Wrestling?

A. Yes.

Q. Okay. Does UFC compete with WWE?

A. It's -- no. I don't think so.

MR. ISAACSON: Could -- I think you should define compete with for who? I mean, eyeballs, fighters, you know, et cetera. So -- so I object to form.

BY MR. DELL'ANGELO:

Q. Have --

A. They did when we were on TV. They're -- I mean, when they're on TV. They're not on TV anymore.

[illegible]

<p style="text-align: right;">449</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 Q. And so it was -- it was certainly before 9 2014; right? 10 A. I don't know. 11 Q. Okay. 12 A. But I'm glad you said that, reminded me of 13 that. 14 Q. Yeah. He has done a good job of coaching 15 you. 16 (Exhibit 95 marked.) 17 MR. DELL'ANGELO: Let's mark an excerpt as 18 Exhibit 95. This is an excerpt from March 14, 2014 19 from the UFC 171 Pre-fight Scrum in Dallas, Texas. 20 (Video clip playing.) 21 REPORTER: Since the launch, people have been 22 comparing Fight Pass to the WWE network. And, you 23 know, is that a fair comparison? Do you look at it as 24 something you should compare with or is that a totally 25 different thing?</p>	<p style="text-align: right;">451</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL 2 Q. Okay. Were they -- you believe they were 3 true at the time you made them? 4 A. Yes. 5 Q. Do you believe that they're still true? 6 A. No. 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 Q. But that was in 2000, though; right? 13 A. And since then -- I don't know when it was. 14 And since then, you know, he's interested in a lot of 15 our people now. You know, Rhonda Rousey was on there. 16 They're definitely interested in Conor McGregor. We 17 have gone back and forth with Brock Lesnar. So, yeah. 18 I would -- I would say we are in competition. 19 Q. Now? 20 A. Yes. 21 Q. But in 2014, your view was that you weren't? 22 A. Whatever I was thinking then, I don't know 23 time. I can't tell you what I was thinking in that 24 interview. But A lot of things change in business. 25 MR. DELL'ANGELO: So let me -- I would like</p>
<p style="text-align: right;">450</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL 2 MR. DANA WHITE: Is it competition? No. I 3 mean, there's people that watch WWE, and there's people 4 that watch UFC. You know, I don't care what the WWE's 5 doing. It doesn't matter. Good for them; I hope they 6 hit a home run, and it's -- it's very successful for 7 them. What we're doing is completely different than 8 from what they're doing. And, you know, you're always 9 going to have people who are going to bitch, but Fight 10 Pass has been a massive home run for us. Huge home 11 run. 12 MR. ISAACSON: I object to the use of the 13 excerpt as a basis for questions on the grounds of 14 completeness. 15 BY MR. DELL'ANGELO: 16 Q. So, Mr. White, were you able to see that 17 video? 18 A. Yep. 19 Q. Were you able to hear it okay? 20 A. Yes. 21 Q. And you were depicted in that video? 22 A. Yes. 23 Q. Okay. Did you make the statements in that 24 video? 25 A. I did.</p>	<p style="text-align: right;">452</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL 2 to mark as Exhibit 96 the video clip from April 16, 3 2014 of -- taken from -- it's an excerpt from 4 April -- sorry, 16, 2014 Tough Nations Finale 5 Post-fight Scrum in Quebec City, Canada. 6 (Exhibit 96 marked.) 7 (Video clip playing.) 8 REPORTER: When it comes to Direct TV, like 9 4/16/2014 just advertising space, for instance, would 10 more of that now benefit you when it comes to promoting 11 pay-per-views with WWE not being a focal point for 12 Direct TV? 13 MR. DANA WHITE: I -- I don't think whether 14 WWE is on there or off there it affects us one way or 15 another. I've always said we're two completely 16 different markets. We're, you know -- you know, is 17 there some crossover? Sure. There is in boxing too. 18 But I don't think with Vince being on Direct TV or 19 being off Direct -- or Direct TV it -- it helps or 20 hurts our business one way or the other. 21 BY MR. DELL'ANGELO: 22 Q. Mr. White, is it correct that in -- 23 MR. ISAACSON: I will object to the use of 24 the video on the grounds of completeness. 25 \\</p>

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1 **DANA WHITE - HIGHLY CONFIDENTIAL**

2 **BY MR. DELL'ANGELO:**

3 **Q. Were you able to see the video, Mr. White?**

4 **A. Yes.**

5 **Q. Okay. It was played as Exhibit 96. And were**

6 **you depicted in that video?**

7 **A. Yes.**

8 **Q. Okay. Did you make the statements that you**

9 **heard after the question was asked?**

10 **A. Yeah.**

11 **Q. And did you believe those statements to be**

12 **true at the time they were made?**

13 **A. Yes.**

14 **Q. Okay. And I believe you said that you've**

15 **always said that the UFC and the WWE were two**

16 **completely different markets; correct?**

17 **A. Right.**

18 **Q. Okay. And is -- is it your testimony that**

19 **you believe there's come a time when you -- where that**

20 **is no longer true?**

21 **A. Yeah.**

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

454

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 **Q. Okay. Mr. White, do you know currently what**

14 **percentage of the UFC's total gross revenues are paid**

15 **to fighters?**

16 **A. I do not.**

17 **Q. Okay. Do you know at any time what**

18 **percentage of the UFC's total gross revenues were paid**

19 **to fighters?**

20 **A. I don't. Lorenzo would know that.**

21 **Q. Lorenzo has spoken about that publicly;**

22 **right?**

23 **A. Yes.**

24 **Q. Okay. And what do you understand that -- and**

25 **when you refer to "Lorenzo," you're referring to**

455

1 **DANA WHITE - HIGHLY CONFIDENTIAL**

2 **Lorenzo White -- or excuse me, Lorenzo Fertitta; right?**

3 **A. My husband, yeah.**

4 **Q. Okay. We're -- we're learning so many new**

5 **things about today.**

6 **A. Yeah.**

7 **Q. Okay. When you're referring to Lorenzo,**

8 **you're referring to Lorenzo Fertitta; right?**

9 **A. Yes.**

10 **Q. Okay. What is -- and what do you understand**

11 **Mr. Fertitta has said publicly about the percentage of**

12 **revenue that the UFC pays to fighters?**

13 **A. I don't know.**

14 **MR. ISAACSON: Objection. Calls for hearsay.**

15 **THE WITNESS: You should -- you should ask**

16 **him those questions. I don't know.**

17 **BY MR. DELL'ANGELO:**

18 **Q. Do you recall having defended statements that**

19 **Mr. Fertitta has made about the percentage of revenue**

20 **that the UFC paid to its fighters?**

21 **A. Yeah. But I bet you when I said it, I said,**

22 **Hey, Lorenzo pointed this whole thing out. If Lorenzo**

23 **knows, then I don't know.**

24 **It's just when we were talking about that**

25 **lawsuit, when I clam up and I say, Yeah, you should**

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1 **DANA WHITE - HIGHLY CONFIDENTIAL**

2 **probably talk to the lawyers about that because I don't**

3 **know what I'm talking about.**

4 **MR. DELL'ANGELO: Well, Counsel, I'm going to**

5 **transition at 7:30; so I'm going to suggest that we**

6 **transition until tomorrow.**

7 **MR. ISAACSON: Where are we at? How much**

8 **time do we have to go?**

9 **VIDEOGRAPHER: Would you like to go off the**

10 **record now or I can -- I can tell you we were nine**

11 **minutes short of the mark of making it eight hours.**

12 **MR. DELL'ANGELO: Okay. So we have about two**

13 **hours left.**

14 **VIDEOGRAPHER: So we have two hours and nine**

15 **minutes.**

16 **MR. ISAACSON: All right. Let's take a**

17 **break.**

18 **VIDEOGRAPHER: This concludes Volume I of the**

19 **videotaped deposition of Dana White. The time is**

20 **approximately 7:25 p.m. We are going off the record.**

21 **(Thereupon, the videotaped deposition**

22 **concluded at 7:25 p.m.)**

23

24

25